

Air Combat Command Approach to Funding Compliance Through Pollution Prevention

Capt Timothy Wood
HQ ACC/CEVQP
11817 Canon Blvd Suite 503
Newport News, VA 23606-2558
tim.wood@langley.af.mil
757-764-9389
DSN 574-9389

Introduction. The Air Force's "P2 first" approach to solving compliance needs has dramatically shifted the way Pollution Prevention projects are identified and programmed. No longer is the program driven by goals, but by correcting and preventing non-compliance. A 12 Sep 97 AF Environmental Division memo states, "AF policy is to use cost effective P2 projects and activities to correct and prevent environmental non-compliance." Several more Air Force policy letters emphasizing its commitment to shifting funds from Environmental Compliance (EC) to P2 solidified the policy shift. Air Combat Command (ACC) has supplemented Air Force policy by releasing "ACC Pollution Prevention Funding Guidance" in June of 1998. This document instructs ACC bases on how to effectively identify, justify, and program valid P2 projects to implement the new AF policy. The purpose of this paper is to review the fundamental change in P2 management and outline how ACC had adjusted its strategy to meet this challenge.

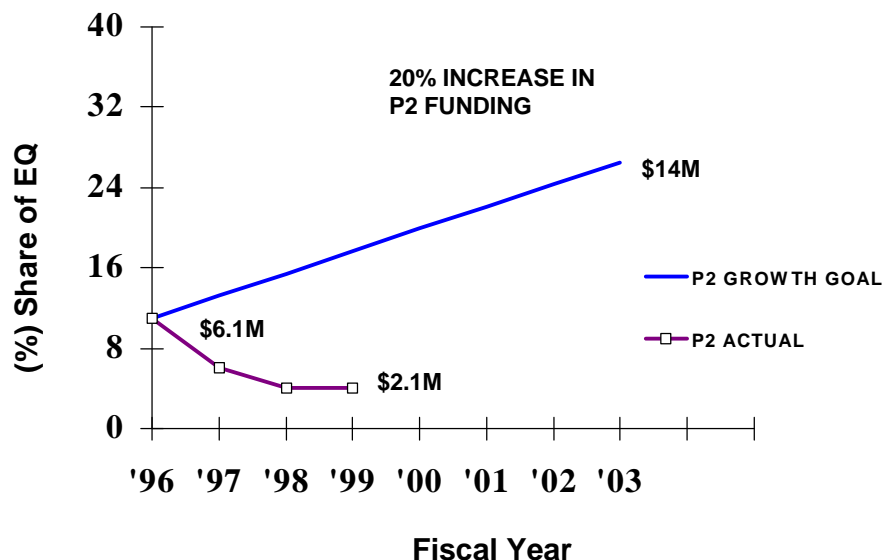
Background. Since its inception, the Air Force's EC program has enjoyed tremendous success. By the end of 1997, the AF had fourteen open enforcement actions for non-compliance and ACC had brought open enforcement actions to zero. This success was achieved with a two-pronged approach: strong emphasis on complying with environmental laws and a financial commitment to correct non-compliant conditions. Similarly, the AF's P2 program had successfully reduced waste streams. DoD goals for solid and hazardous waste reduction have been achieved before the target dates, and the AF has instituted the hazardous material pharmacy (Hazmart) concept for cradle to grave management of hazardous materials.

Unfortunately, the success of the EC and P2 programs has been separate and independent. By instituting "environmental quality (EQ)," the AF hopes to combine the success of these two programs to achieve a common end -- environmental compliance. This common goal can be seen as not only compliance, but also, through P2, eliminating the need to comply.

The EC program has traditionally found end-of-pipe solutions to solve compliance requirements. This approach side-stepped the AF's environmental management hierarchy (source reduction, recycling/reuse, treatment, disposal). The typical end-of-pipe approach (Fig. 1) involves obtaining permits and/or conducting recurring sampling, monitoring, and reporting. In addition to generating long-term operations and services costs, this approach also involves several "compliance points," or activities that are susceptible to enforcement action. A P2 approach (Fig. 1), which involves source elimination, recycling, re-use, or treatment may also be available, which eliminates the need for permits and associated sampling and reporting. The compliance

pe
th
“q

ACC P2 Funding Growth



The Air Force Civil Engineer backed up the commitment to Compliance Through Pollution Prevention (CTP2) by agreeing to increase by 20% P2's share of the EQ budget based on a FY96 baseline by FY03 (excluding manpower and training costs). ACC's P2 budget in FY96 was \$6.17M, 11% of the EQ budget. In FY03 P2 will need to have 31% of the EQ budget, which will be approximately \$17.4M. The figure below shows the share of the ACC EQ budget that the P2 program has received over the last few years. Traditional P2 projects are being funded at lower levels. Beginning in FY00, funds will begin to migrate to the new CTP2 program.

AF Funding Guidance. The 12 Sep 97, AF Environmental Division memo that released new funding guidance for the P2 program, included an updated set of DoD EQ Class definitions. Previously referred to in the Air Force as "Levels," these class definitions drive our investment strategy. In general, Class I requirements are those which correct an environmental problem where we are not complying with mandates from the federal, state, or local authority, or investments needed in the program year to avoid being out of compliance.

Previous to this funding guidance, P2 and EC had separate class definitions. The distinction is now gone. Projects that qualified as "P2 Level 1" in the past must now compete for funding on the same playing field as EC Class I requirements. This means that it will be more difficult to obtain funding for previously "goal driven" P2 requirements such as recycling, composting, and hazardous material management.

The new emphasis in CTP2 and the change in funding class definitions present a challenge to P2 program managers. Air Force Major Commands must now find a way to increase the P2 share of the EQ budget by 20% and, at the same time, only fund valid Class I requirements.

ACC Funding Guidance. In order to meet the challenge of beefing up the P2 Class I program, ACC developed P2 Funding Guidance to give its bases instructions on how to increase and support their programs in FY00-05. The document streamlines and standardizes the Class 0 (Operations and Services) budget and gives direction on programming valid Class I and Class II projects.

Recurring Requirements. Recurring Operation and Services, requirements are categorized into five standard line items: Civilian Pay, Office Supplies, Hazmart Supplies/Equipment, Training/TDY, and QRP Supplies. Each line item has an established amount for each base to program or sets a maximum limit bases cannot exceed. This standardized program lets the bases know up front what ACC will validate, so they can effectively submit a program that will be funded. The bases no longer have to play a guessing game trying to program the right combination of recurring projects to win the P2 jackpot. The standard list also allows ACC to distribute P2 funds fairly. No one base can corner the market on Class 0 projects. Other (non-standard) recurring projects may be programmed, but must be well justified and will be approved on a case-by-case basis.

Non-Recurring Requirements. Instructions for programming non-recurring requirements consist of a 3-step process of project identification, justification, and programming.

Identifying Projects. The first step in building a solid program is finding the right projects to program. Bases are encouraged to:

- Go through the valid non-recurring projects listed in the 12 Sep 97 HQ AF/ILEV letter for solutions to compliance problems.
- Look through the base EC program and talk to base compliance experts. With the new funding shift, P2 solutions can be found and funded from traditional compliance projects.
- Examine the findings from the last external and internal ECAMPs.
- Review the base's last P2 Opportunity Assessment (OA) for valid projects.
- Check out the Model Shop Reports developed by AFCEE (see PRO-ACT Cross Talk, Oct 97). Six Model Shop Reports have been developed from P2 OAs for some of the largest users of hazardous material and biggest producers of HW. These reports are contained in the Aug 97 Tri-Service Pollution Prevention Resource CD. They are also available for downloading on the AFCEE home page (**Error! Bookmark not defined.**).
- Talk to the customers; use the P2 Cross Functional Team (CFT) as a means to beat the bushes for valid P2 compliance-driven projects. Target the biggest compliance problem areas for the best P2 solutions.

Justifying Projects. If the project cannot be justified as a valid O&S requirement or as a Class I project, it will probably not be funded. ACC is now using a scoring system to prioritize and fund non-recurring projects (Table 1). Bases are encouraged to use the same scoring criteria to help justify and prioritize projects. Projects will be scored using the following criteria:

- Regulatory Driver – What law drives this project (i.e. CAA, RCRA, CWA)? Will it reduce or prevent the base from receiving an enforcement action?
- Regulatory Agreement – Is there an agreement with the regulator to perform this action?
- Payback – How soon will the project pay for itself? (if applicable)
- DoD/AF goal – Does it help meet an AF or DoD goal?

Table 1. ACC Funding Matrix

Regulatory Driver	Out of Compliance	Prevents potential non-compliant situation	Reduces compliance vulnerability	Goal-driven only
	10	7	3	0
Regulatory Agreement		Yes	No	
		5	0	
Payback	2 years or less	5 years or less	Over 5 years or payback evident but not shown	Negligible payback
	5	3	1	0
AF, DoD goal		Helps meet goal	Doesn't help with goal	
		3	0	

The funding matrix is used to assign each project a score from 0 to 23. Projects will be prioritized for funding based on this score. The above items must each be addressed in the narrative block of the WIMS-ES A-106 report, so projects can be accurately scored.

The most important of the criteria to justify is the regulatory driver. This portion of the narrative must explain what makes the project Class I. P2 projects can be justified as Class I if they solve a compliance problem, are included in a permit, close an ECAMP finding, or prevent recurring compliance violations. The base legal office and compliance program managers can help justify the funding class of P2 projects. Examples of Class I justifications for typical P2 projects are:

- Aqueous Parts Washer - CAA Title V permit requires parts washer by 1 Sep 98.
- Washrack Recycler - Wash water recycler stops unpermitted discharge of metals in violation of CWA.
- Backflow Prevention Devices - Base water supply system violates SDWA; requires backflow prevention devices.
- Vapor Recovery System - Reduces HAPs to prevent violations of NESHAP limits.

- Oil Water Separator Elimination - Eliminates recurring discharges of _____ in violation of CWA.

Programming Projects. The A-106 module on the Work Information Management System – Environmental Subsystem (WIMS-ES) is the required mechanism to forward requirements and justification to ACC and the Air Staff for validation and funding. Before a Pollution Prevention project can be validated and funded, it must be submitted in A-106.

Transferring Projects from EC. Projects cannot be programmed in both the EC and P2 programs. Pollution Prevention solutions are to be used as the first choice for solving compliance problems and, therefore, bases should program compliance projects within the P2 program first, if they have a P2 solution. When a project is moved from the EC to P2 program within A-106, the project's PEC and narrative must be updated.

Suggested Projects. The new funding guidance allows program managers to look places they haven't looked in the past for P2 projects. Below are examples of some valid P2 compliance-driven projects and project areas, organized by media. (These are simply examples of valid projects and not an exhaustive list; even valid projects must have Class I justification for funding.)

- Clean Air Act
 - Low VOC paint equipment or other VOC-reduction initiatives
 - Projects that reduce emissions below Title V or NESHAPs
- Clean Water Act
 - Projects that eliminate NPDES permits
 - Water pretreatment projects
 - Oil-water separator (OWS) elimination and floor drain closing
 - Projects that tie processes/septic systems to the sanitary sewer
 - Inflow/infiltration study/repair
 - Deicing vacuum trucks
- Safe Drinking Water Act
 - Backflow prevention projects
 - Wellhead Protection
- RCRA – Hazardous Waste
 - Parts cleaning systems
 - Hazardous waste minimization equipment
 - Part B permit elimination
 - Bullet traps for small arms ranges to capture lead
 - Aquatic harvesters or other equipment to reduce the use of herbicides/pesticides
- Underground Storage Tanks
 - Leak detection/corrosion protection or elimination of USTs
 - AST secondary containment (state requirements)
- Focused Opportunity Assessments
 - By media (air, storm water, drinking water, etc.)
 - By process/function

- Design of valid P2 projects

Conclusion. The new Compliance Through Pollution Prevention policy shift in the Air Force environmental program has provided an effective way to solve and prevent compliance problems through P2 solutions. The ACC Pollution Prevention Funding Guidance provides implementation instructions for the new policy. The guidance standardizes ACC's P2 program and instructs bases to identify, justify, and program valid projects to grow the P2 program. The new policy and guidance will steer the Air Force toward cost-effective and practical solutions to compliance problems over the next several years.

References:

1. HQ USAF/ILEV letter, 12 Sep 97, Pollution Prevention Funding Guidance.
2. HQ USAF/ILE letter, 20 Nov 97, Pollution Prevention to Achieve Compliance.
3. HQ USAF/ILE letter, 28 Jan 98, Transferring Funds from Environmental Compliance to Pollution Prevention.
4. HQ USAF/IL letter, 20 Apr 98, Environmental Compliance Through Pollution Prevention.
5. HQ ACC/CEV letter, June 98, ACC Pollution Prevention Funding Guidance.